

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS
LLC,

Defendants.

Case No: 19-cv-10023-KPF

**NOTICE OF PDV HOLDING, INC.'S MOTION FOR PARTIAL STAY OF
EXECUTION OF FINAL JUDGMENT PENDING APPEAL**

Please take notice that the undersigned, on behalf of PDV Holding, Inc. (“PDVH”), hereby moves this Court before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York 10007, for an Order granting, pursuant to Federal Rule of Civil Procedure 62 or the Court’s equitable powers, a stay during the pendency of the Plaintiffs’ appeal to the United States Court of Appeals for the Second Circuit of the execution of the portions of the Court’s December 1, 2020 Final Judgment [ECF No. 229] pertaining to the Pledge Agreement¹ and underlying Collateral, including the declaration that the Trustee is entitled to direct the Collateral Agent to sell the pledged CITGO Shares and that the Collateral Agent is entitled to so sell. The grounds for this motion are set forth in the accompanying Memorandum of Law.

¹ Capitalized terms not defined herein refer to the terms as defined in PDVH’s Memorandum of Law in Support of this motion, filed contemporaneously herewith.

Dated: December 11, 2020

Respectfully submitted,

/s/ Jeffrey B. Korn

Jeffrey B. Korn

Michael Gottlieb

Nicholas Reddick

Cole Mathews

Kyle Mathews

WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue

New York, NY 10019

Telephone: (212) 728-8000

Facsimile: (212) 728-8111

jkorn@willkie.com

cmathews@willkie.com

1875 K Street NW

Washington, DC 20006-1238

Telephone: (202) 303-1442

Facsimile: (202) 303 2442

mgottlieb@willkie.com

nreddick@willkie.com

kmathews@willkie.com

Attorneys for PDV Holding, Inc.